Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

Conditional Major/Synthetic Minor
AIR QUALITY PERMIT

Permittee Name:	**Toyo Tire & Rubber Co., Ltd.**
Mailing Address:	**17-18, Edobori 1Chome Nishiku, Osaka**
Source Name:	**Toyo Automotive Parts (USA), Inc.**
Mailing Address:	**P.O. Box 828** **521 Page Drive** **Franklin, Kentucky 42134**
Source Location:	**521 Page Drive, Franklin, Kentucky**
UTM:	**4062.8N, 542.7E**
Permit Number:	**F-01-013 (Revision 1)**
Old Log Number:	**53710**
Log Number:	**55806**
Review Type:	**Construction/Operation for Conditional Major and PSD Synthetic Minor Precluding MACT**
KYEIS ID #:	**21-213-00046**
SIC Code:	**3061**
Regional Office:	**Bowling Green Regional Office** **1508 Westen Avenue** **Bowling Green, KY 42104**
County:	**Simpson**
Application Complete Date:	**April 30, 2001**
Issuance Date:	**July 3, 2001**
Revision Date:	**September 26, 2003**
Expiration Date:	**July 3, 2006**

John S. Lyons, Director
Division for Air Quality

Revised 4/17/2001

TABLE OF CONTENTS

Rev #	Permit type	Log #	Complete Date	Issuance Date	Summary of Action
----	**Initial Issuance**	**53710**	**4/30/01**	**7/3/01**	
1	**Minor revision**	**55806**	**7/29/03**	**9/26/03**	**Addition of two adhesive spray coating booths (EP34 &EP35). Revise description of emission points.**
			--		

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction/operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - AFFECTED FACILLITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EP01 (1-1 and 2-1) This emission point is for Indirect Heat Exchangers.

EP01 is two 100 hp output boilers equipped with low NO_x burners.
Each boiler has a heat input capacity of 4.185 MM Btu/hr.
Natural gas is burned to produce process heat.
EP01 construction commenced: projected for January 2002.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:015**, New indirect heat exchangers, applicable to affected facilities with a capacity of 250 million BTU per hour heat input or less commenced after August 9, 1972, limits particulate and sulfur dioxide emissions.

Regulation **401 KAR 59:005**, General provisions, provides for the establishment of monitoring requirements, performance testing requirements, and other general provisions as related to new sources effective December 1, 1982.

Operating Limitations:

401 KAR 59:015

To demonstrate continuous compliance with Emission Limits #1 - #3, the following shall apply.

1. Only natural gas shall be burned.

2. Proper operation and maintenance shall be practiced.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Emission Limitations:

401 KAR 59:015

The following emission limitations will apply unless the permittee petitions the Cabinet for alternative emission limitations according to Section 3(3) of the above listed regulation.

1. Section 4(1)(a) limits emissions of **particulate matter** to no more than 0.56 lbs/MM Btu actual heat input.

Note: The limit was established because the maximum heat input rating for all indirect heat exchangers greater than or equal to 1 MM Btu/hr heat input capacity at the source is 8.37 MM Btu/hr.

2. Section 4(2) limits visible emissions to a maximum of **20% opacity** except for emissions occurring during cleaning of the fire box, blowing of soot, and building of a new fire.

a. While cleaning of the firebox or blowing of soot is being done, visible emissions are limited to a maximum of 40% opacity for not more than 6 consecutive minutes in any 60 consecutive minutes.

b. There is no limit to visible emissions opacity while building a new fire provided a manufacturer recommended method is used and the manufacturer recommended time frame for bringing the boiler up to operating conditions is not exceeded.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Limitations (Continued):

401 KAR 59:015

3. Section 5(1)(a) limits emissions of any gas which contains **sulfur dioxide** to no more than 3.0 lbs/MM Btu actual heat input.

Note: The limit was established because the maximum heat input rating for all indirect heat exchangers greater than or equal to 1 MM Btu/hr heat input capacity at the source is 8.37 MM Btu/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9, 5, and 6, respectively.

If operated in accordance with Operating Limitations #1 and #2, compliance has already been demonstrated.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Testing Requirements:

N/A

Specific Monitoring Requirements:

N/A

Specific Record Keeping Requirements:

401 KAR 59:015

To demonstrate compliance with Operating Limitation #1,

1. A record of the type of fuel burned shall be maintained.

To demonstrate compliance with Operating Limitation #2,

2. A copy of the manufacturer's operating and maintenance specifications shall be maintained and made available to appropriate Division personnel.

3. Any operation or maintenance that is less stringent than the manufacturer's minimum recommendation shall be recorded.

4. Dates and descriptions of maintenance that affects proper operation shall be recorded.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Specific Reporting Requirements:

401 KAR 59:015

As part of compliance demonstration for Emission Limitations #1 and #2, reporting requirement 5 in Section F shall be modified to require only a summary of permit deviations for this emission point. This shall be done every 6 months and certified by a responsible official as specified in Section F requirement 5. See reporting requirements 6, 7, and 8 from Section F for additional reporting requirements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements (Continued):

401 KAR 59:005

Section 3(1)(d) requires written notification of any physical or operational change which may increase the emission rate of any air pollutant to which a standard applies to be furnished to the Cabinet. This notice shall be postmarked 60 days before the change is commenced or as soon as practicable. The notice shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP06 (6-1 and 6-2)
EP09 (9-1 and 9-2)
EP10 (10-1 and 10-2)
EP-34 (34-1 and 34-2)
EP-35 (35-1 and 35-2)

These emission points are adhesive spray coating machines.

EP06 is a continuous automatic coating machine for tube insides of automobile anti-vibration components. The machine has a rated capacity of 720 pieces/hr.

EP09 is a continuous automatic coating machine for flat spray coating of automobile anti-vibration components. The machine has a rated capacity of 900 pieces/hr.

EP10 is a continuous automatic spindle spray-coating machine for automobile anti-vibration components. The machine has a rated capacity of 900 pieces/hr.

EP34 is a continuous automatic coating machine for tube insides of automobile anti-vibration components. The machine has a rated capacity of 720 pieces/hr.

EP35 is a continuous automatic spindle spray-coating machine for automobile anti-vibration components. The machine has a rated capacity of 900 pieces/hr.

Each coating machine performs the following functions in the following order.

1st metal is preheated in a hot air oven,
2nd airless spray gun applicator 1 applies a primer,
3rd the primed part is dried in a second hot air oven,
4th airless spray gun applicator 2 applies a coat of cover adhesive,
5th and finally, the parts are dried in a third hot air oven.

Ovens utilize steam generated at EP01.

Exhaust filters, assumed to be 90% efficient, are used to control particulate matter emissions.

All of these machines are enclosed within a permanent total enclosure and vented to a thermal oxidizer.

EP06 construction commenced: projected for March 2002.
EP09 construction commenced: projected for March 2002.
EP10 construction commenced: projected for March 2002.
EP34 construction commenced: projected for August 2003.
EP35 construction commenced: projected for August 2003.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:

401 KAR 59:010

The following limits shall apply to assure compliance with Emission Limitations #1 and #2.

1. Filters shall be in place at all times when a machine is applying adhesive.

2. Filters shall be replaced when determined to be inefficient (as determined through visual inspection).

3. The units shall be operated and maintained in accordance with the manufacturer's recommendations unless otherwise allowed in this permit.

Conditional Major and PSD Synthetic Minor Limit on VOC - See Section D.

Conditional Major Limit on HAPs - See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Limitations:

401 KAR 59:010

1. Section 3(1) limits visible emissions to less than 20% opacity.

2. Section 3(2) limits emissions of particulate matter from each coating machine to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively.

Given the description provided for this emission point, compliance with Operating Limitations #1 - #3 demonstrates compliance with the above emission limitations unless testing is required.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Testing Requirements:

None except that testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Monitoring Requirements:

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #1 and #2.

1. Operating Limitations #1 and #2 shall be monitored daily before the unit is operated (on days when a coating is applied).

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

2. The permittee shall observe opacity at least once per operating week and record results in a log, noting color, duration, density(heavy or light), cause and corrective action taken for any abnormal visible emissions.

Specific Record Keeping Requirements:

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #1 and #2.

1. Date and results of filter inspections shall be recorded when monitored.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Specific Record Keeping Requirements (Continued):

401 KAR 59:010

2. All maintenance necessary to demonstrate compliance with Operating Limitation #3 shall be recorded and include date and time.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Reporting Requirements:

As part of compliance demonstration for Emission Limitations #1 and #2, reporting requirement 5 in Section F shall be modified to require only a summary of filter replacement, maintenance, and deviations from permit requirements. This shall be done every 6 months and certified by a responsible official as specified in Section F requirement 5. See reporting requirements 6, 7, and 8 from Section F for additional reporting requirements.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Control Equipment Operating Conditions:

See Operating Limitations above.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP25 (25-1) This emission point is a spray painting machine.

EP25 is a semi-automatic painting machine for automobile anti-vibration components with a rated capacity of 450 pieces/hr.
EP25 performs the following functions in the following order.
1st parts are spay painted by an air gun,
2nd and finally, the parts are dried in a hot air oven.
The oven utilizes steam generated at EP01.
Exhaust filters, assumed to be 90% efficient, are used to control particulate matter emissions.
EP25 is enclosed within a permanent total enclosure and is vented to a thermal oxidizer.
EP25 construction commenced: projected for March 2002.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:

401 KAR 59:010

The following limits shall apply to assure compliance with Emission Limitations #1 and #2.

1. Filters shall be in place at all times when painting is performed.

2. Filters shall be replaced when determined to be inefficient (as determined through visual inspection).

3. The unit shall be operated and maintained in accordance with the manufacturer's recommendations unless otherwise allowed in this permit.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Emission Limitations:

401 KAR 59:010

1. Section 3(1) limits visible emissions to less than 20% opacity.

2. Section 3(2) limits emissions of particulate matter from the unit to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively.

Given the description provided for this emission point, compliance with Operating Limitations #1 - #3 demonstrates compliance with the above emission limitations unless testing is required.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Limitations (Continued):

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Testing Requirements:

None except that testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Monitoring Requirements:

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #1 and #2.

1. Operating Limitations #1 and #2 shall be monitored daily before the unit is operated (on days when painting is performed).

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

2. The permittee shall observe opacity at least once per operating week and record results in a log, noting color, duration, density(heavy or light), cause and corrective action taken for any abnormal visible emissions.

Specific Record Keeping Requirements:

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #1 and #2.

1. Date and results of filter inspections shall be recorded when monitored.

2. All maintenance necessary to demonstrate compliance with Operating Limitation #3 shall be recorded and include date and time.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements:

As part of compliance demonstration for Emission Limitations #1 and #2, reporting requirement 5 in Section F shall be modified to require only a summary of filter replacement, maintenance, and deviations from permit requirements. This shall be done every 6 months and certified by a responsible official as specified in Section F requirement 5. See reporting requirements 6, 7, and 8 from Section F for additional reporting requirements.

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Control Equipment Operating Conditions:

See Operating Limitations above.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP11 (11-1 and 11-2)
EP12 (12-1 and 12-2)
EP13 (13-1 and 13-2)
EP14 (14-1 and 14-2)
EP15 (15-1 and 15-2)

These emission points are roll adhesive coating machines.

EP11 and EP12 are continuous automatic roll coating machines for tube insides of automobile anti-vibration components. The machines each have a rated capacity of 720 pieces/hr.

EP13, EP14 and EP15 are continuous automatic roll coating machines for tube outsides of automobile anti-vibration components. The machines each have a rated capacity of 400 pieces/hr.

Each coating machine performs the following functions in the following order.

1st metal is preheated in a hot air oven,
2nd primer is roll coated to the metal at applicator 1,
3rd the primed part is dried in a second hot air oven,
4th a cover adhesive is roll coated to the part at applicator 2,
5th and finally, the parts are dried in a third hot air oven.

Ovens utilize steam generated at EP01.

All of these machines are enclosed within a permanent total enclosure and vented to a thermal oxidizer.

EP11 construction commenced: projected for March 2002.
EP12 construction commenced: projected for March 2002.
EP13 construction commenced: projected for March 2002.
EP14 construction commenced: projected for March 2002.
EP15 construction commenced: projected for March 2002.

APPLICABLE REGULATIONS:

None

Operating Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Emission Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Testing Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Monitoring Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Record Keeping Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Reporting Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Control Equipment Operating Conditions:

See Operating Limitations above.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP07 (7-1 and 7-2) These emission points are
EP08 (8-1 and 8-2) dip adhesive coating machines.

EP07 and EP08 are semi-automatic coating machines with hangers for automobile anti-vibration components. The machines each have a rated capacity of 900 pieces/hr.

Each coating machine performs the following functions in the following order.

1st primer is coated on the metal at dip applicator 1,
2nd the primed part is dried in a hot air oven,
3rd cover adhesive is applied at dip applicator 2,
4th and finally, the parts are dried in a second hot air oven.

Ovens utilize steam generated at EP01.

All of these machines are enclosed within a permanent total enclosure and vented to a thermal oxidizer.

EP07 construction commenced: projected for March 2002.
EP08 construction commenced: projected for March 2002.

APPLICABLE REGULATIONS:

None

Operating Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Emission Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Testing Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Monitoring Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Record Keeping Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Reporting Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC

See Section D.

Conditional Major Limit on HAPs

See Section D.

Specific Control Equipment Operating Conditions:

See Operating Limitations above.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP27 (27-1) This emission point is a dip painting machine.

EP27 is a semi-automatic painting machine for automobile anti-vibration components with a rated capacity of 360 pieces/hr.
EP27 performs the following functions in the following order.
1st parts are painted by submersion in a dip tank,
2nd and finally, the parts are dried in a hot air oven.
The oven utilizes steam generated at EP01.
EP27 is enclosed within a permanent total enclosure and is vented to a thermal oxidizer.
EP27 construction commenced: projected for March 2002.

APPLICABLE REGULATIONS:

None

Operating Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Emission Limitations:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Testing Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Monitoring Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Specific Record Keeping Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements:

Conditional Major and PSD Synthetic Minor Limit on VOC
See Section D.
Conditional Major Limit on HAPs
See Section D.

Specific Control Equipment Operating Conditions:

See Operating Limitations above.

Alternate Operating Scenarios:

N/A

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	Description	Generally Applicable Regulation
1.	2 blasting machines with bag filters	401 KAR 59:010
2.	2 zinc phosphate process lines with a combined rated capacity of 6,544 pieces/hr using a packed bed scrubber to reduce mist emissions (estimated to be 99% efficient)	401 KAR 59:010
3.	3 bush auto buffing machines, 4 auto buffing machines, and 2 hand buffing machines (used for trimming parts after molded)	401 KAR 59:010
4.	Oil dipping tank (for lubrication in manufacturing process)	None
5.	40 injection molding machines	401 KAR 59:010
6.	2 TPE boot molding presses	None
7.	6 swaging (crimping) presses	None
8.	Assembly	None
9.	2 arc welders	401 KAR 59:010

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

Conditional Major and PSD Synthetic Minor Limits have voluntarily been accepted to avoid major source status and applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, requirements. Exceedance of a major source emission level, defined in 401 KAR 52:001 or 401 KAR 51:017, will trigger additional requirements.

Emission Limitations:

Plantwide VOC conditional major/synthetic minor limitation

1. For any 12 consecutive month period, plantwide VOC emissions shall be **< or = to** 90 tons (demonstrated monthly).

Compliance Demonstration Method:

Compliance can be demonstrated through use of Division approved control efficiencies, emission factors, and test results.

VOC emitted (lbs) = S **[**VOC emissions from natural gas combustion**]**
+ S **[**VOC emissions from adhesive application and clean-up**]**
+ S **[**VOC emissions from injection molding**]** + S **[**VOC emissions from TPE boot molding**]**
+ S **[**VOC emissions from oil dipping for lubrication**]**
+ S **[**VOC emissions from hydraulic mount assembly**]**
+ S **[**VOC emissions from paint application and clean-up**]**

Substitution into the VOC equation will result in the following equation.

VOC emitted (lbs) = ft^3 of natural gas burned by the permittee x natural gas VOC emission factor
+ lbs of VOC utilized in adhesive application and clean-up x (1 – VOC control efficiency)
+ lbs of raw material processed in injection molding machines
x the injection molding VOC emission factor
+ lbs of mold release utilized in TPE molding x the weight percentage of VOC in mold release
+ lbs of VOC utilized in oil dipping for lubrication
+ lbs of VOC utilized in hydraulic mount assembly
+ lbs of VOC utilized in painting and clean-up x (1 – VOC control efficiency)

All emission factors and control efficiencies may be tested (in accordance with Division for Air Quality policy) to obtain values but absent test results or revised EPA emission factors, the following emission factors shall be used to demonstrate compliance.

Natural gas VOC emission factor from AP-42	=	5.5 lbs of VOC/10^6 ft^3 of natural gas fired
VOC control efficiency	=	value determined through testing (assumed to be 0.98 until testing is performed)
Injection molding VOC emission factor	=	0.0000325 lbs of VOC / lb of raw material processed

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Operating Limitations:

The following is required to make the above emission limit enforceable as a practical matter.

Plantwide VOC conditional major/synthetic minor limitation

1. Raw material use shall be such that VOC emitted, calculated using the above compliance demonstration method for Emission Limitation #1, from the source during any 12 consecutive month period is **< or = to** 180,000 lbs (demonstrated monthly).

2. All VOC emissions from adhesive and paint application shall be captured and vented to the regenerative thermal oxidizer.

Compliance Demonstration Method:

Initial compliance must be demonstrated through testing in accordance with appropriate EPA reference methods. Subsequent compliance may be demonstrated through parametric monitoring. Air pressure measurements recorded shall be at least sufficient enough to result in 100% capture demonstrated through EPA Method 204.

Alarms activated by low pressure measurements shall indicate an immediate need for corrective actions. Air pressure into the control device shall be recorded before restarting any coating application following corrective actions to demonstrate that 100% capture is being achieved.

3. Air pressure alarms for air flow into the regenerative thermal oxidizer shall be set to warn operators when air flow is less than 70% of normal or when air flow is within 5% of failing EPA Method 204, whichever gives the greatest margin for assured compliance with EPA Method 204.

4. Combustion chamber temperature of the regenerative thermal oxidizer shall be maintained above the minimum temperature the oxidizer is operated at during initial testing at all times when coating or painting is performed.

5. Maintain and operate equipment in accordance with Section E of this permit.

Testing Requirements:

Plantwide VOC conditional major/synthetic minor limitation

The following testing shall be performed as part of initial compliance demonstration with the above limitations and shall be completed using appropriate methods referenced in 401 KAR 50:015, Section 1 or 40 CFR.

1. Regenerative thermal oxidizer VOC destruction efficiency shall be demonstrated through stack testing.

2. VOC capture efficiency for emission units vented to the regenerative thermal oxidizer shall be demonstrated through testing.

Subsequent testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 50:045 Section 4 to demonstrate continued compliance.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Monitoring Requirements:

Plantwide VOC conditional major/synthetic minor limitation

The following monitoring shall be performed to demonstrate that capture and control of VOC emissions is equivalent to initial demonstration.

1. Combustion chamber temperature of the regenerative thermal oxidizer shall be monitored continuously by a strip chart recorder.
2. Air pressure into the regenerative thermal oxidizer shall be monitored continuously by an alarm designed to notify equipment operators as described in Operating Limitation #3.

Specific Record Keeping Requirements:

Plantwide VOC conditional major/synthetic minor limitations require the following to be recorded. When options are allowed, weight percentage shall be recorded with lbs of the material and VOC content shall be recorded with gallons of the material.

1. Combustion chamber temperature of the regenerative thermal oxidizer shall be recorded continuously by a strip chart recorder.
2. Air pressure into the regenerative thermal oxidizer shall be recorded daily when the oxidizer is in operation.
3. Air pressure into the regenerative thermal oxidizer shall also be recorded following any corrective actions taken to maintain or fix capture efficiency and prior to adhesive or paint application.
4. All low air pressure into the regenerative thermal oxidizer alarm activation shall be recorded.
5. Ft^3 of natural gas burned shall be recorded for each month.
6. Lbs or gallons of each adhesive applied shall be recorded for each month.
7. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of each adhesive applied shall be recorded.
8. Lbs or gallons of each solvent used in adhesive application or clean-up shall be recorded for each month.
9. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) for each adhesive solvent shall be recorded.
10. Lbs of raw material processed in the injection molding machines shall be recorded for each month.
11. Lbs or gallons of mold release used in TPE molding shall be recorded for each month.
12. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of the mold release used shall be recorded.
13. Lbs or gallons of oil used in dipping for lubrication shall be recorded for each month.
14. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of the oil used shall be recorded.
15. Lbs or gallons of ethylene glycol used in hydraulic mount assembly shall be recorded for each month.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Specific Record Keeping Requirements (Continued):

Plantwide VOC conditional major/synthetic minor limitations

16. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of the ethylene glycol used shall be recorded.

17. Lbs or gallons of each paint applied shall be recorded for each month.

18. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of each paint applied shall be recorded.

19. Lbs or gallons of each solvent used in paint application or clean-up shall be recorded for each month.

20. Depending on recording of lbs or gallons, the VOC percentage (by weight) or VOC content (in lbs/gal) of each paint solvent shall be recorded.

21. The amount of VOC emitted each month calculated using the compliance demonstration method for Emission Limitation #1 shall be recorded.

22. The total VOC emitted for each 12 consecutive month period shall be recorded.

23. Record maintenance and corrective activities performed to comply with Section E of this permit.

Specific Reporting Requirements:

Plantwide VOC conditional major/synthetic minor limitations require the following to be reported semiannually. These reports shall be certified by a responsible official, and delivered by electronic media (such as fax or e-mail) or postmarked to the Division's Bowling Green Regional Office by January 30th and July 30th of each year. These reports may also be delivered by courier as long as the reports are stamped received as indicated above. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. The minimum regenerative thermal oxidizer operating temperature during the period shall be reported.

2. All air pressure alarm activation and resulting corrective actions during the period shall be reported.

3. The minimum air pressure into the regenerative thermal oxidizer recorded during the period shall be reported.

4. Any deviations from requirements in this section during the period shall be reported.

5. The VOC emission calculation for each month in the semiannual period shall be reported.

6. The total VOC emission for each 12-month period ending in the semiannual period shall be reported.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Conditional Major Limits on HAP emissions have voluntarily been accepted to avoid major source status. Exceedance of the major source emission level, as defined in 401 KAR 52:001, will trigger additional requirements.

Emission Limitations:

Plantwide individual HAP conditional major limitation

1. For any 12 consecutive month period, plantwide individual HAP emissions shall be **< or = to** 9.0 tons as demonstrated on a monthly basis.

Plantwide combined HAPs conditional major limitation

2. For any 12 consecutive month period, plantwide combined HAPs emissions shall be **< or = to** 22.5 tons as demonstrated on a monthly basis.

Compliance Demonstration Method:

Compliance can be demonstrated through use of Division approved control efficiencies, emission factors, and test results.

For **individual HAP** emissions

Individual HAP emitted (lbs) =

S **[**Individual HAP emitted from adhesive application and clean-up**]**

+ S **[**Individual HAP emitted from hydraulic mount assembly**]**

+ S **[**Individual HAP emitted from paint application and clean-up**]**

Substitution into the individual HAP equation will result in the following equation.

Individual HAP (lbs) = lbs of individual HAP utilized in adhesive application and clean-up x (1 – VOC control efficiency) + lbs of individual HAP utilized in hydraulic mount assembly + lbs of individual HAP utilized in painting and clean-up x (1 – VOC control efficiency)

VOC control efficiency may be tested (in accordance with Division for Air Quality policy) to revise the value used to demonstrate compliance.

VOC control efficiency = value determined through testing (assumed to be 0.98 until testing is performed)

Note: There are also some individual HAPs that are particulate in nature that the above individual HAP equation is not valid for. However, particulate HAP emissions from this source do not have major source potential emissions. Therefore, the above compliance demonstration is not required for particulate HAPs.

For **combined HAP** emissions

Combined HAPs emitted (lbs) = S **[**lbs of individual HAP emitted**]**

Note: Particulate HAPs will not be emitted in quantities that would warrant inclusion in the above equation.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Operating Limitations:

The following is required to make the above emission limits enforceable as a practical matter and compliance with these limits demonstrates compliance with the above Emission Limitations.

Plantwide individual HAP limitation

1. Raw material use shall be such that individual HAPs emitted, calculated using the above compliance demonstration method for individual HAP emissions, from the source during any 12 consecutive month period is **< or = to** 18,000 lbs (demonstrated monthly).

Plantwide combined HAPs limitation

2. Raw material use shall be such that combined HAPs emitted, calculated using the above compliance demonstration method for combined HAP emissions, from the source during any 12 consecutive month period is **< or = to** 45,000 lbs (demonstrated monthly).

Operating Limitations #2 - #5 on page 19 of this permit are also required to demonstrate compliance with the above HAP limitations.

Testing Requirements:

Testing Requirements on page 19 of this permit are also required to demonstrate compliance with the above HAP limitations.

Monitoring Requirements:

Monitoring Requirements on page 20 of this permit are also required to demonstrate compliance with the above HAP limitations.

Specific Record Keeping Requirements:

Plantwide conditional major HAP limits require the following to be recorded. When options are allowed, weight percentage shall be recorded with lbs of the material and HAP content shall be recorded with gallons of the material.

1. Specific Record Keeping Requirements #1, #2, #3, #4, #6, #8, #15, #17, #19 and #23 on pages 20 and 21 of this permit must also be recorded to demonstrate compliance with the above HAP limitations.

Note: Multiple copies are not required.

2. Depending on recording of lbs or gallons, the individual HAP percentage (by weight) or individual HAP content (in lbs/gal) of each adhesive applied shall be recorded.

3. Depending on recording of lbs or gallons, the individual HAP percentage (by weight) or individual HAP content (in lbs/gal) of each adhesive solvent shall be recorded.

4. Depending on recording of lbs or gallons, the individual HAP percentage (by weight) or individual HAP content (in lbs/gal) of the ethylene glycol used in hydraulic mount assembly shall be recorded.

5. Depending on recording of lbs or gallons, the individual HAP percentage (by weight) or individual HAP content (in lbs/gal) of each paint applied shall be recorded.

6. Depending on recording of lbs or gallons, the individual HAP percentage (by weight) or individual HAP content (in lbs/gal) of each paint solvent shall be recorded.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Specific Record Keeping Requirements (Continued):

Plantwide conditional major HAP limits

7. The amount of individual HAP emitted each month calculated using the compliance demonstration method for individual HAP emissions shall be recorded.

8. The amount of combined HAPs emitted each month calculated using the compliance demonstration method for combined HAP emissions shall be recorded.

9. Total individual HAP emissions for each 12 consecutive month period shall be recorded.

10. Total combined HAP emissions for each 12 consecutive month period shall be recorded.

Specific Reporting Requirements:

Plantwide conditional major HAP limitations require the following to be reported semi-annually. These reports shall be certified by a responsible official, and delivered by electronic media (such as fax or e-mail) or postmarked to the Division's Bowling Green Regional Office by January 30th and July 30th of each year. These reports may also be delivered by courier as long as the reports are stamped received as indicated above. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. Specific Reporting Requirements #1 - #3 on page 21 of this permit are also required for compliance demonstration of plantwide conditional major HAP limitations.

Note: Multiple copies are not required.

2. Any deviations from requirements in this section during the period shall be reported.

3. The individual HAP emission calculation for each month in the semiannual period shall be reported.

4. The combined HAP emissions calculation for each month in the semiannual period shall be reported.

5. The total individual HAP emission for each 12-month period ending in the semiannual period shall be reported.

6. The total combined HAP emissions for each 12-month period ending in the semiannual period shall be reported.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

2. As part of compliance demonstration with limitations in Section D of this permit, thermocouples used to monitor thermal oxidizer combustion chamber temperature shall be calibrated at least once every 12 months.

3. As part of compliance demonstration with limitations in Section D of this permit, pressure transducers used to monitor air pressure into the regenerative thermal oxidizer shall be calibrated as recommended by the manufacturer and at least once every 12 months if the manufacturer recommendation is less frequent.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)(1) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place (as defined in this permit), and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality[401 KAR 52:030 Section 3(1)(f)1a and Section 1a (7) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

3. In accordance with the requirements of 401 KAR 52:030 Section 3(1)f the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit:
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.
   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All reports shall be certified by a responsible official pursuant to 401 KAR 52:030 Section 22. All deviations from permit requirements shall be clearly identified in the reports.

7 In accordance with the provisions of 401KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:

a. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.

b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.

8 The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7 above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.5 [Section 1b V(3) and (4) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

9 Pursuant to 401KAR 52:030, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit in accordance with the following requirements:

a. Identification of each term or condition;

b. Compliance status of each term or condition of the permit;

c. Whether compliance was continuous or intermittent;

d. The method used for determining the compliance status for the source, currently and over the reporting period.

e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be postmarked by January 30th of each year. **Annual compliance certifications should be mailed to the following addresses:**

Division for Air Quality Bowling Green Regional Office 1508 Westen Avenue Bowling Green, KY 42104	Division for Air Quality Central Files 803 Schenkel Lane Frankfort, KY 40601

10. In accordance with 401KAR 52:030, Section 3(1)(d), the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission survey is mailed to the permittee. If a KYEIS emission report is not mailed to the permittee, comply with all other emission reporting requirements in this permit.

11. Pursuant to Section VII (3) of the policy manual of the Division for Air Quality as referenced in 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork..

12. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
    a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:
        i. The size and location of both the original and replacement units; and
        ii. Any resulting change in emissions;
    b. The PTE of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
    c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;
    d. The replacement unit shall comply with all applicable requirements; and
    e. The source shall notify Regional office of all shutdowns and start-ups.
    f. Within six (6) months after installing the replacement unit, the owner or operator shall:
        i. Re-install the original unit and remove or dismantle the replacement unit; or
        ii. Submit an application to permit the replacement unit as a permanent change.

SECTION G - GENERAL PROVISIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030 Section 3(1)(b) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to the termination, revocation and reissuance, revision, or denial of a permit [Section 1a (2) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a (5) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030 Section 18. The permit will be reopened for cause and revised accordingly under the following circumstances:
   a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:030 Section 12;
   b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
   c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

   Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit[Sections 1a (6) and (7) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

SECTION G - GENERAL PROVISIONS (CONTINUED)

5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:030 Section 7(1)].

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a (11) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a (3) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a (12)(b) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038 Section 3(6) [Section 1a (9) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:030 Section 11(3)].

11. This permit does not convey property rights or exclusive privileges [Section 1a (8) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.

13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.

SECTION G - GENERAL PROVISIONS (CONTINUED)

15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

16. Permit Shield – A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
    (a) Applicable requirements that are included and specifically identified in this permit; and
    (b) Non-applicable requirements expressly identified in this permit.

17. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:030 Section 3(1)(c)].

18. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:030 Section 8(2)].

(a) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:030 Section 12].

(b) Permit Revisions

1. Minor permit revision procedures specified in 401 KAR 52:030 Section 14 (3) may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:030 Section 14 (2).

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

EP-34 (34-1 and 34-2) These emission points are adhesive
EP-35 (35-1 and 35-2) spray coating machines**.**

1. Construction of any process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

2. Within thirty (30) days following commencement of construction and within fifteen (15) days following start-up and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Regional Office listed on the front of this permit in writing, with a copy to the Division's Frankfort Central Office, notification of the following:
   a. The date when construction commenced.
   b. The date of start-up of the affected facilities listed in this permit.
   c. The date when the maximum production rate specified in the permit application was achieved.

3. Pursuant to 401 KAR 52:030, Section 3(2), unless construction is commenced within eighteen (18) months after the permit is issued, or begins but is discontinued for a period of eighteen (18) months or is not completed within a reasonable timeframe then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Upon written request, the Cabinet may extend these time periods if the source shows good cause.

4. For those affected facilities for which construction is authorized by this permit, a source shall be allowed to construct with the proposed permit. Operational or final permit approval is not granted by this permit until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055. If compliance is not demonstrated within the prescribed timeframe provided in 401 KAR 50:055, the source shall operate thereafter only for the purpose of demonstrating compliance, unless otherwise authorized by Section I of this permit or order of the Cabinet.

5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration ***(test)*** on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements. ***These performance tests must also be conducted in accordance with General Provisions G(d)6 of this permit and the permittee must furnish to the Division for Air Quality's Frankfort Central Office a written report of the results of such performance test***

6. Terms and conditions in this permit established pursuant to the construction authority of 401 KAR 51:017 or 401 KAR 51:052 shall not expire.

SECTION G - GENERAL PROVISIONS (CONTINUED)

7. Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by 401 KAR 50:016, Section 1.(1), at least one month prior to the date of the required performance test, the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the Division's Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the Division shall be notified of the actual test date at least ten (10) days prior to the test.

8. Pursuant to Section VII 1.(2 and 3) of the policy manual of the Division for Air Quality as referenced by 401 KAR 50:016, Section 1.(1), if a demonstration of compliance, through performance testing was made at a production rate less than the maximum specified in the application form, then the permittee is only authorized to operate at a rate that is not greater than 110% of the rate demonstrated during performance testing. If and when the facility is capable of operation at the rate specified in the application, compliance must be demonstrated at the new production rate if required by the Division.

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. Pursuant to 401 KAR 52:030 Section 23(1), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
   d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.

2. Notification of the Division does not relieve the source of any other local, state or federal notification requirements.

3. Emergency conditions listed in General Provision G(f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:030 Section 23(3)].

SECTION G - GENERAL PROVISIONS (CONTINUED)

4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof[401 KAR 52:030 Section 23(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

   RMP Reporting Center
   P.O. Box 3346
   Merrifield, VA, 22116-3346

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
   e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

SECTION H - ALTERNATE OPERATING SCENARIOS

N/A

SECTION I - COMPLIANCE SCHEDULE

N/A